



Gregory Keenan <gwkeenan24@gmail.com>

Leavitt v. Central Credit--One Week Extension request

6 messages

Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 4:48 PM

To: esperling@glaserweil.com, amiller@glaserweil.com, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, swoodnik@grsm.com

Counsel:

Plaintiff intends to seek a one week extension of time to respond to the motion to dismiss and to file an amended complaint. The basis for the extension is that one of our attorneys has been feeling under the weather and the other has been dealing with a personal matter. Could you please provide your position regarding this extension request?

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

postmaster@grsm.com <postmaster@grsm.com>

Mon, Jun 17, 2024 at 4:48 PM

To: gwkeenan24@gmail.com

Delivery has failed to these recipients or groups:swoodnik@grsm.com

The email address you entered couldn't be found. Please check the recipient's email address and try to resend the message. If the problem continues, please contact your email admin.

Diagnostic information for administrators:Generating server: [DREXCH07.gordonrees.com](https://drexch07.gordonrees.com)swoodnik@grsm.com

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To: <esperling@glaserweil.com>, <amiller@glaserweil.com>, Andrew Grimm
<agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>,
Gregory Keenan <gregory@digitaljusticefoundation.org>, <swoodnik@grsm.com>
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adultscore=0
priorityscore=317 unknownsenderscore=20 phishscore=0 impostorscore=0
suspectscore=0 spamscore=0 malwarescore=0 mlxscore=0 bulkscore=0
lowpriorityscore=0 mlxlogscore=414 classifier=spam adjust=0 reason=mlx
scancount=1 engine=8.12.0-2405010000 definitions=main-2406170184
domainage_hfrom=10536
Return-Path: gwkeen24@gmail.com

Final-Recipient: rfc822;swoodnik@grsm.com

Action: failed

Status: 5.1.10

Diagnostic-Code: smtp;550 5.1.10 RESOLVER.ADR.RecipientNotFound; Recipient not found by SMTP address
lookup

----- Forwarded message -----

From: Greg Keenan <gwkeen24@gmail.com>

To: <esperling@glaserweil.com>, <amiller@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, <swodnik@grsm.com>

Cc:

Bcc:

Date: Mon, 17 Jun 2024 16:48:20 -0700

Subject: Leavitt v. Central Credit--One Week Extension request

Counsel:

Plaintiff intends to seek a one week extension of time to respond to the motion to dismiss and to file an amended complaint. The basis for the extension is that one of our attorneys has been feeling under the weather and the other has been dealing with a personal matter. Could you please provide your position regarding this extension request?

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

Greg Keenan <gwkeen24@gmail.com>

Mon, Jun 17, 2024 at 5:53 PM

To: esperling@glaserweil.com, amiller@glaserweil.com, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, swodnik@grsm.com, Andrew Grimm <andrew.b.grimm@gmail.com>

Counsel:

Following up. I see that Ms. Wodnik's email address was mistyped in the original email (and bounced back), so I am recirculating this email so as to include her in the email.

Could you please provide your position regarding Plaintiff's intent to seek a one-week extension of time to respond to the motion to dismiss and to file an amended complaint in the Leavitt v. Central Credit matter. I am available to confer by phone this evening, as well.

Thank you,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

[Quoted text hidden]

Alexander Miller <amiller@glaserweil.com>

Mon, Jun 17, 2024 at 8:12 PM

To: Greg Keenan <gwkeen24@gmail.com>, Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimm@gmail.com>

Hi Greg,

We will stipulate to an extension that also re-notes the motion to a week later so we have sufficient time for our reply. Please send over a draft stipulation when convenient.

Best,

Alex



Alexander Miller
ASSOCIATE

Glaser Weil Fink Howard Jordan & Shapiro LLP
600 West Broadway, Suite 2150
San Diego, CA 92101
glaserweil.com | [bio](#)

amiller@glaserweil.com

T 619.762.5952



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[Quoted text hidden]

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Greg Keenan <gwkeenan24@gmail.com>

Mon, Jun 17, 2024 at 8:50 PM

To: Alexander Miller <amiller@glaserweil.com>

Cc: Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimm@gmail.com>

Alex,

Thank you for your professional courtesy regarding the stipulation. I have sent over the draft stipulation, as requested.

Please see attached.

Best,
Greg

Gregory Keenan
Attorney
Digital Justice Foundation
516.633.2633

[Quoted text hidden]

2 attachments



LeavittEveriWDWash 2024-06-17 Proposed Order.docx
56K



LeavittEveriWDWash 2024-06-17 Leavitt Ext Req.docx
59K

Greg Keenan <gwkeen24@gmail.com>

Mon, Jun 17, 2024 at 11:09 PM

To: Alexander Miller <amiller@glaserweil.com>

Cc: Elizabeth Sperling <esperling@glaserweil.com>, Andrew Grimm <agrimm3@gmail.com>, Andrew Grimm <andrew@digitaljusticefoundation.org>, Gregory Keenan <gregory@digitaljusticefoundation.org>, "swodnik@grsm.com" <swodnik@grsm.com>, Andrew Grimm <andrew.b.grimm@gmail.com>

Hi Alex,

Looking to put this on file. Can you get back to us in the next twenty minutes or so?

Best,
Greg

[Quoted text hidden]